

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
Old LC, Inc. *et al.*,

Debtors.

Official Committee of Unsecured Creditors  
of Old LC, Inc., *et al.*, for and on behalf of  
the estates of Old LC, Inc., *et al.*;

*Plaintiff,*

v.

Upfront V, LP, Breakwater Credit  
Opportunities Fund, L.P., *et al.*,

*Defendants.*

Chapter 11

Case No. 19-11791 (BLS)

Adv. No. 20-51002 (BLS)

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 9010-1 and the certification below, counsel hereby moves for the admission *pro hac vice* of Sabin Willett of Morgan, Lewis & Bockius LLP to represent Defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski in the above-captioned case.

Dated: November 23, 2020

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Jody C. Barillare

Jody C. Barillare (#5107)

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**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the Commonwealth of Massachusetts and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 8/30/16. I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court for District Court.

/s/ Sabin Willett

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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.